

PROPOSAL EVALUATION

Integrated Regional Water Management Implementation Proposition 50, Chapter 8 IRWM Implementation Step 1

PIN: 5816
Applicant Name: Butte County Dept of Water & Resource Conservation
Project Title: Butte County Integrated Water Management

Funds Requested: \$25,232,618
Cost Match: \$40,910,104
Total Project Cost: \$66,142,722

DESCRIPTION: The projects are: 1) The Rock Creek/Keefer Slough Flood Control and Recharge Project; 2) the Paradise Ridge Water Supply Reliability and Public Safety Project; 3) the Butte and Tehama Counties Pilot Groundwater Recharge Projects; 4) the Glen/Butte/Colusa/Tehama Water Quality Enhancement Project; 5) the Palermo and Bangor Canal Water Use Efficiency Project and 6) the Lower Tuscan Water Supply Reliability and Water Quality Projects.

Question: Consistency with Minimum IRWM Standards - This evaluation will focus on whether the applicant has demonstrated that the IRWM Plan meets the minimum standards.

Pass

Question: Consistency with IRWM Standards - Adopted IRWM Plan and Proof of Formal Adoption. Weighting factor is 1. 3

The applicant states that the Butte County Board of Supervisors adopted their IRWMP on May 24, 2005. However, proof of this adoption could not be found. Resolution No. 05-089 was provided and it states that the IRWMP was adopted by the Butte County Board of supervisors in Resolution No. 05-067 which was not provided. There is no evidence that any entities from Colusa, Glenn, or Tehama Counties have adopted the IRWMP. Furthermore, cover sheets with multiple dates on the IRWMP created additional confusion - for example a "Forward" dated January 2005 stating that the report is approved; a cover page labeled "Public Review Draft", dated June 2004; and an additional cover page for the executive summary, dated May 2005.

Question: Consistency with IRWM Standards - Description of Region. Weighting factor is 1. 2

The IRWMP indicates that Butte County is actually the region, not the four counties that the applicant said to encompass the region. The applicant coordinates with other local agencies on issues of mutual interest, but they do not jointly manage water resources in the four-county region. The IRWMP does not describe responsibilities of the 11 water suppliers in the region. Attachment 5 states a reason for linking the four counties together as a region -- they overlie the Lower Tuscan Formation, a regional aquifer. However, the IRWMP only describes current and future water resources in Butte County, except for potential utilization of the Lower Tuscan aquifer. All standards in the IRWMP are only concerned with Butte County. The applicant failed to properly address the ecological processes, environmental resources within regional boundaries, social and cultural makeup, etc.

Question: Consistency with IRWM Standards - Objectives. Weighting factor is 1. 2

The applicant states that a steering group developed objectives for Butte County. 13 objectives are listed in Attachment 4, but the IRWMP lists 15 objectives. The objectives of the IRWMP in Attachment 4 do not match the major water-related objectives in Attachment 5. The IRWMP does not identify objectives together with water management strategies. The strategies in Attachment 5, to some extent, match policy recommendations in the IRWMP. However, the scoring is based upon what is contained in the IRWMP itself.

Question: Consistency with IRWM Standards - Water Management Strategies and Integration. Weighting factor is 1. 2

To some extent, the IRWMP integrates water management strategies to meet the objectives, but those relationships are not at all clear and are not cross-referenced in Attachment 4. The applicant did not meaningfully discuss how the strategies work together to provide reliable water supply, protect or improve water quality, and achieve other objectives. The IRWMP mentions there are added benefits of integration of multiple water management strategies, but benefits are not described. Attachment 6 integrates proposed projects with IRWMP objectives to some extent, but it is not the IRWMP and scoring is based upon what is contained in the IRWMP.

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Question: Consistency with IRWM Standards - Priorities and Schedule. Weighting factor is 1.

2

The IRWMP does not discuss short- and long-term priorities of the four-county region in clear and complete manner, but Attachment 5 discusses regional priorities in six problem areas shared by other Sacramento Valley counties. Since the IRWMP only pertains to Butte County and not the other three counties in the region, the priorities of the other counties are unknown. Entities from the other counties provided letters of support.

Question: Consistency with IRWM Standards - Implementation. Weighting factor is 1.

2

The applicant identifies several policy recommendations that should be implemented to meet the planning objectives of Butte County. A list of implementation steps is provided for each "policy." A timeline for active or planned projects could not be found in the IRWMP. Unfortunately, the IRWMP is disjointed and incomplete and does not appear to be an implementable plan with regard to the region. The applicant states that the Butte County DWRC will implement the steering committee's recommendations following consideration and recommendation by the County Water Commission and adoption of suggested policies by the Board of Supervisors. However, the applicant states that the implementation of any specific project would comprise only of those related activities within the direct authority of the County.

Question: Consistency with IRWM Standards - Impacts and Regional Benefits. Weighting factor is 1.

2

The IRWMP does not include an evaluation of potential negative impacts within the region and in adjacent areas from its implementation. Nor does it include a statement that an evaluation was conducted and no potential negative impacts were determined to exist either within or outside the region as a result of the IRWMP. Further, the IRWMP does not identify advantages of the regional plan, as opposed to individual local efforts, which are not articulated at all except to list several local agencies in response to the Application Questions.

Question: Consistency with IRWM Standards - Technical Analysis and Plan Performance. Weighting factor is 1.

2

Methods and analyses the applicant used to develop the IRWMP are documented to a fault. The IRWMP would be more useful if it focused on clearly presenting how the results of public input received was fashioned into a plan that is logically organized and complete rather than focusing on the process. With regard to the technical feasibility of projects, Attachment 5 states that one of the six proposed projects has a completed feasibility study, one has a feasibility study that is 3/4 complete, and EIRs are underway on five of the six projects. The IRWMP does not discuss measures that will be used to evaluate project/plan performance, monitoring systems that will be used to gather performance data or mechanisms to adapt project operations and IRWMP implementation based on performance data collected.

Question: Consistency with IRWM Standards - Data Management. Weighting factor is 1.

2

Data management systems/websites discussed in Attachment 5 and appear to be well thought out. The applicant has an interactive website to display reports and information and recently obtained a grant to develop a Basin Management Objective Information Center, which will allow "better storage and retrieval of water information." However, only a general and vague discussion was found addressing the existing monitoring efforts in the IRWMP. The applicant states that Butte County data "could certainly be shared...with GAMA/SWAMP," but no further discussion on the details of implementing this could be found. Butte's website does not address the other counties except for a four-county water quality report that can be downloaded. Other four-county data could easily be added to this website provided they all opt to operate under a four-county IRWMP, which does not now exist.

Question: Consistency with IRWM Standards - Financing. Weighting factor is 1.

2

The applicant states in Attachment 5, "where the specific beneficiaries of the projects are within special districts, a local or federal share when appropriate shall support the cost of that project." A discussion of the funding/financing for IRWMP implementation could not be found in the IRWMP. However, Attachment 7 indicates a cost-estimate "share" breakdown for the six proposed projects. Attachment 5 addresses costs related to O&M of implemented projects in Attachment 5 in general terms with "O&M costs will be born by local districts where appropriate and by County..." While the applicant made an effort to address each of the criteria, all of the discussion was too vague to properly respond to the criteria in the PSP.

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Question: Consistency with IRWM Standards - Relation to Local Planning & Sustainability. Weighting factor is 1.

2

The IRWMP does not say much about ongoing coordination with local planning and management efforts, but representatives from some other local agencies in Butte County and one from Glenn County were on the steering committee. The IRWMP does not discuss how the identified actions, projects, or studies relate to planning documents established by the other local agencies in the four-county region. The IRWMP does demonstrate some coordination with local land use planning decision makers, but does not discuss how local agency planning documents relate to the IRWMP water management strategies and the dynamics between the two levels of planning documents. It discusses county-level decision makers and a county-level plan. Therefore, it appears that there is no local/regional planning relationship. The IRWMP does not address the local planning in the other counties.

Question: Consistency with IRWM Standards - Stakeholder Involvement & Coordination. Weighting factor is 1.

4

The IRWMP includes stakeholder participation, and involved a sub-regional process. A public outreach plan was developed and ultimately, a steering committee was formed to focus on the IRWMP. The steering committee was composed of stakeholders of varied interests. In regard to their involvement in influencing water management decisions, the applicant indicates the purpose of the steering committee was to "work together to assemble and apply knowledge and experience regarding Butte County water resources and develop recommendations for consideration by the Water Commission." Coordination with State and federal agencies included having a DWR member present at the steering committee meetings, as well as working with USBR to financially support their groundwater model conversion. The IRWMP does not address involvement of stakeholder from other counties.

Question: Funding Match. This evaluation will focus on whether the applicant has demonstrated the ability to meet the minimum funding match or has requested a waiver or reduction in the funding match.

Pass

Question: Description of Proposal. Weighting factor is 3.

9

Attachment 6 describes six proposed projects, but not the two proposed programs. Attachment 6 is somewhat consistent with IRWMP, but attachments appear tailored to provide information and key words not in the IRWMP to retroactively meet the criteria. At times, the rationale for the proposal is sufficient to understand its relationship to the IRWMP, but the IRWMP does not apply to the four-county region. The IRWMP does not describe consequential metrics or criteria to be used to show measurable water quality and water supply improvements or how the six projects and two programs will be monitored and evaluated after implementation to see if they meet the original intent. Each project is described in adequate detail with some scientific basis and project benefits are described. Since the IRWMP objectives were not clear, it is hard to relate projects back to the IRWMP for consistency.

Question: Project Prioritization. Weighting factor is 2.

4

The six proposed projects are prioritized relative to one another. The highest priority of the two long-term projects and the highest priority of the 4 short-term projects are identified. Otherwise, the projects are said to be high or very high. There is limited correlation between the six proposed projects described Attachment 6 with the policy recommendations in the IRWMP and the 30 Integrated Water Resources Plan Options in the IRWMP Appendix F. It is difficult to even compare the six projects with the 30 options and the policy recommendations to try to determine how they overlap, so understanding their relationships and relative priorities to one another is not practicable.

Question: Cost Estimate. Weighting factor is 1.

3

The applicant provided tables breaking down the costs, and it included the basic categories. They did not include any discussion of the different line items, especially the \$42 million land purchase for the Rock Creek/Keefer Slough Flood Control project. They also had a separate table for "Butte County Management of Program" for \$2,559 million. It is unclear whether this would be overhead as there is project management costs associated with the individual projects.

Question: Schedule. Weighting factor is 1.

3

A somewhat generalized schedule is provided for each of the six proposed projects, each showing the sequence and timing for implementation of the major, generalized tasks for each project. Missing from the schedule, however, is the "Butte County Management Program", which is included as a cost/budget item in Attachment 7. This on-going project, identified as "project management" related to IRWMP implementation, should be included in the schedule shown in Attachment 7.

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Question: Need. Weighting factor is 2.

4

Attachment 9 only argues for 5 of the 6 projects, and no programs. Local and regional economic and environmental conditions and fiscal impacts relative to the need for most projects and programs are not discussed in detail. Attachment 9 states, "The need for the completion of the projects identified in Butte County's IWRP are related to a commitment that the citizens of the County be protected, or remain whole in the face of anticipated transfers." But, the IRWMP does not discuss the impacts of water transfers. The applicant states that the State Water Project may transfer unneeded supplies into a turnback pool for sale at a lower price than Butte County prefers. It also states that a majority of the County's allocation remains unused and the County could take excess Article 21 water from the project in the future. Hence, Butte County supplies exceed its demands, and need is questionable.

Question: Disadvantaged Communities. Weighting factor is 2.

3

Attachment 10 provides information indicating several cities in the four-county region are DACs, but does not relate that information to direct benefits from the six proposed projects and two proposed programs.

Question: Program Preferences. Weighting factor is 1.

3

The proposed projects should support and improve the local water supply reliability and improve water quality standards too. It does not make a priority of addressing impaired water bodies or ASBS. They did not make a case for benefiting DACs.

TOTAL SCORE: 56
